

Message

From: Hathaway, Margaret [Hathaway.Margaret@epa.gov]
Sent: 5/18/2021 7:24:56 PM
To: Steven Callen [steven.callen@bayer.com]
CC: Tindall, Kelly [tindall.kelly@epa.gov]; Schmid, Emily [Schmid.Emily@epa.gov]; Thomas Orr [thomas.orr@bayer.com]; George Sabbagh [george.sabbagh@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]
Subject: RE: Dicamba Training Materials

Thanks Steven.

I appreciate you sending these and will share with the EPA dicamba team.

Best regards,

Margaret Hathaway (Meg)
Senior Regulatory Specialist
U.S. Environmental Protection Agency
OCSPP: Office of Pesticide Programs
Registration Division – Herbicide Branch
hathaway.margaret@epa.gov
(703) 305-5076

From: Steven Callen <steven.callen@bayer.com>
Sent: Tuesday, May 18, 2021 12:00 PM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Tindall, Kelly <tindall.kelly@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Thomas Orr <thomas.orr@bayer.com>; George Sabbagh <george.sabbagh@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Dicamba Training Materials

Hi Meg,

Based on your comments, I thought it would be helpful to additionally supply you with both the complete Training Deck and the Education Deck to give EPA a more thorough picture of the dicamba training and education Bayer conducts. The Education Deck contains the exact same training content as the Training Deck; however, it has some systems benefits materials as well and removes all language related to the completion certificate. The Education Deck is posted online to ensure anyone has access to the deck should they have questions after they take the training.

Thanks,
Steven

From: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Sent: Tuesday, May 11, 2021 7:38 PM
To: Steven Callen <steven.callen@bayer.com>
Cc: Tindall, Kelly <tindall.kelly@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Thomas Orr <thomas.orr@bayer.com>; George Sabbagh <george.sabbagh@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Dicamba Training Materials

Hi Steven:

Thanks for sending me that courtesy file; I appreciate it. There's some confusion on my office's end because this document ("XTENDIMAX® WITH VAPORGRIP® TECHNOLOGY (264-1210) HERBICIDE RESISTANCE MANAGEMENT PLAN EDUCATIONAL / INFORMATIONAL COMPONENT") was titled as a description of Bayer's herbicide resistance

management plan, but not the dicamba-specific training, and the contents appears not to include a complete copy of the training materials themselves on either subject.

For example, on the topic of buffers there's an acknowledgement that training on buffers is a required training element, and there's a graphic on page 18 about the 240 ft. buffer distance, but I'm not seeing content on the other nuances of the buffer requirements that are on the XtendiMax® With VaporGrip® Technology label.

I see there's a link in the document to the Roundup Ready Xtend Training & Stewardship webpage, but it looks like you need to register and take the training in order to access the training materials.

- Meg

From: Steven Callen <steven.callen@bayer.com>
Sent: Tuesday, May 11, 2021 3:53 PM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Tindall, Kelly <tindall.kelly@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Thomas Orr <thomas.orr@bayer.com>; George Sabbagh <george.sabbagh@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Dicamba Training Materials

Hi Meg,

We submitted the education plan back in late January (1/27/2021). We submitted it through the portal (receipt #1063947) and received notification on 1/29/2021 that it was transmitted to OPP. Looking through my email, it doesn't look like I submitted a courtesy copy directly to you when we sent it through the portal, so I have attached it here.

Please let me know if you need anything else!

Thanks,
Steven

From: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Sent: Tuesday, May 11, 2021 2:28 PM
To: Steven Callen <steven.callen@bayer.com>
Cc: Tindall, Kelly <tindall.kelly@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Thomas Orr <thomas.orr@bayer.com>; George Sabbagh <george.sabbagh@bayer.com>
Subject: Dicamba Training Materials

Hello Steven:

In addition to the dicamba grower survey we've already been corresponding about, another element of the 2020 dicamba terms and conditions of registration that my office would like an update on is the requirement to "Provide to EPA the original education program for dicamba users within three months of the issuance of this registration."

Could you please verify where Bayer is on satisfying this requirement? It's my understanding that training is not an area on which the various registrant companies are collaborating on a single, joint initiative.

Best regards,
Meg

Margaret Hathaway (Meg)
Senior Regulatory Specialist
U.S. Environmental Protection Agency
OCSPP: Office of Pesticide Programs

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